

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN,

Plaintiff

v.

MCCONNELL VALDES, LLC et al.,

Defendants

Civil No.: 24-1136 (SCC)

MOTION FOR JOINDER

TO THE HONORABLE COURT:

COME NOW defendants Sampo International Insurance Company and Endurance American Specialty Insurance Company (collectively, “Sampo”), through their undersigned attorney, and very respectfully state and pray as follows:

On March 11, 2025, Plaintiff filed a motion for change of venue at docket 102. On March 17, 2025, McConnell Valdés, LLC (“McConnell Valdés”) filed an opposition fundamentally arguing that, per 28 U.S.C. § 1404(a), the Court could only transfer the case to another district if the case could have been brought there in the first place. *See* docket 108. As McConnell Valdés correctly pointed out, the case could never have been filed in Vermont to begin with. Sampo hereby join McConnell Valdés’ opposition at docket 108.

On March 19, 2025, AIG Insurance Company (“AIG”) filed a joinder to McConnell Valdés’s opposition to the motion to change venue, explaining additional reasons why the action could not have been commenced against AIG in Vermont. *See* docket 109. These same arguments apply to Sampo, and Sampo therefore join AIG’s opposition at docket 109.

On March 21, 2025, plaintiff requested leave to file a Third Amended Complaint, arguing

the amendment was necessary to address a counterclaim filed on June 13, 2024. *See* docket 110, ¶ 3. McConnell Valdés filed an opposition on March 25, 2025 (*see* docket 111), correctly pointing out that on August 13, 2024, two months after the counterclaim was filed, plaintiff filed a Second Amended Complaint. For this reason and others raised in the opposition, McConnell Valdés stated that plaintiff's request to amend was improper. Somo and Endurance hereby join McConnell Valdés' opposition at docket 111.

WHEREFORE, codefendants Somo International Insurance Company and Endurance American Specialty Insurance Company respectfully request that this Honorable Court take note of the joinders herein stated.

In San Juan, Puerto Rico, this 27th day of March, 2025.

I HEREBY CERTIFY that on this same date, I uploaded a pdf version of this document to the Court's CM/ECF system, which will send notification of such filing to all parties, through their counsel of record.

Respectfully submitted,

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